## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

JAMES K. MONROE	)
Plaintiff(s),	)
	)
<b>v.</b>	)
	) CASE NO. 2:06-CV-928-MEF
OFFICER L. THOMAS, ET AL.	)
	)
Defendant(s).	)
	)
	)

## **SUPPLEMENTAL SPECIAL REPORT**

COME NOW the Defendants, Louis Thomas, C.T. Jenkins, Richard Golden, Levan Thomas, Leon Forniss and George Edwards, by and through the Attorney General for the State of Alabama, the Honorable Troy King, and in accordance with this Honorable Court's January 19, 2007 and February 1, 2007 Orders, offer the following:

- 1. Exhibit 1 – Affidavit of Annie Lattimore which certifies the attached enemies lists of Inmates Vincent Crim, Michael Grant, and James Monroe dated January 19, 2007.
  - 2. No such enemies lists existed at the time the incident in question occurred.

Respectfully submitted,

TROY KING Attorney General

/s/ Jeffery H. Long Jeffery H. Long Assistant Attorney General

#### ADDRESS OF COUNSEL:

Office of the Attorney General 11 South Union Street Montgomery, AL 36130 (334) 242-7555 (334) 242-2433

### **CERTIFICATE OF SERVICE**

I hereby certify that I have, this the 1<sup>st</sup> day of February, 2007, electronically filed the foregoing with the Clerk of Court using the CM/ECF system and served a copy of the foregoing upon the Plaintiff, by placing same in the United States Mail, postage prepaid and properly addressed as follows:

James K. Monroe, AIS 167435 Staton Correctional Facility POB 56 Elmore, AL 36025

The Clerk using the CM/ECF system will send notification of this filing to the following parties:

Paul M. James, Jr. Attorney for PHS Defendants

> /s/ Jeffery H. Long Jeffery H. Long

## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

JAMES MONROE #167435	)
Plaintiff,	)
v.	) CIVIL ACTION NO. 2:06-CV-928-MEF
OFFICER L. THOMAS, et.al.	) ) )
Defendants,	)

#### AFFIDAVIT

State of Alabama

**Elmore County** :

Before me, the undersigned authority, a Notary Public in and for said County and State of Alabama at Large, personally appeared Annie Latimore, who being known to me and being by me first duly sworn, deposes and says on oath as follows:

My name is Annie Latimore. I hereby certify and affirm that I am the Alternate Custodian of Records at Staton Correctional Facility, P.O. Box 56, Elmore, Alabama 36025. I am over twenty-one years of age and am competent to testify to the matters stated herein

The attached State of Alabama Department of Corrections Enemy Validation Committee Sheets and Enemies List Report consisting of six pages, is true, and exact and correct photocopies of documents maintained here in the institutional files.

I further certify and affirm that said documents are maintained in the usual and ordinary course of business at Staton Correctional Facility and that said documents

and entries therein were made reasonably near the time that such acts, events and transactions referred to therein are said to have occurred.

SWORN TO and SUBSCRIBED before me this 24 day of January 2007.

My Commission Expires:

## ENEMIES LIST

IT HAS BEEN DOCUMENTED	BY ME, WANDA	WORTHEY NAME	<del>,</del>
CLASSIFICATION SPECI	ALIST , STAT	ON CORRECTIONAL FAC	CILITY ,
01-19-2007 DATE	, THAT INMATE <u>v</u>	INCENT CRIM NAME	9415
B/M , AIS # 16780°	7,	STATON CORRECTION/ INSTITUTION	AL FACILITY,
CANNOT LIVE IN POPULAT: FEAR OF BODILY HARM:	ION WITH THE FOLL	OWING NAMED INMATES	S WITHOUT
NAME	R & S	AIS #	INSTITUTION
JOLLY, ANDRE	B/M	128255	KILBY
	,1217		
			<u> </u>

DISTRIBUTION WILL BE MADE TO THE GREEN FILE AND THE CENTRAL FILE ON ALL OF THE ABOVE NAMED INMATES. THE CENTRAL FILE COPY SHOULD BE SENT DIRECTLY TO THE SUPERVISOR OF THE RECORDS & ID SECTION OF THE CENTRAL RECORDS DIVISION FOR PERMANENT PLACEMENT IN THE FRONT OF THE CENTRAL FILE. THE GREEN FILE COPY WILL BE SENT TO THE SOCIAL SERVICES COORDINATOR, IF THE INMATE(S) IS LOCATED IN OTHER INSTITUTIONS, FOR PERMANENT PLACEMENT IN THE FRONT OF THE GREEN JACKET. DOCUMENTATION AND/OR REASONS WHY THE INMATE(S) SHOULD BE KEPT SEPARATE WILL BE RECORDED ON THE BACK OF THIS FORM. IT IS ESSENTIAL THAT REASONS FOR SEPARATION BE SPECIFIC, WELL DOCUMENTED, AND FACTUAL.

**BOC #252** 

# **ENEMY VALIDATION COMMITTEE**

FROM:	Wanda Worthey, Classification Spec.	DATE:	01/19/2007
RE:	Crim, Vincent BM#167807		
	itutional Enemy Validation Committee aton Correctional Facility		
	nate referenced above has claimed the t Andre BM#128255	following inn	nate(s) as being his enemy (ies):
For rea	son(s) indicated below:		
Facilit	eptember 4, 2006, while both subject's w y, inmate Andre Jolly (BM#128255) did s 167807) in the right hand with a prison m	stab inmate	
	review and render a decision as to whe		his is a valid enemy situation.
	Staton Correctional Facility sification Coordinator aton Correctional Facility		
After a ju	idicious review of the above referenced	matter, the f	following decision is rendered:
t is in the	e best interest of institutional security the ed in the same population. This is determined in the same population.	at the two at mined to be	forementioned inmates not a valid enemy situation.
VALIDAT	Unity Education CO	Leise MMITTÉE	VALIDATION COMMITTEE

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### ENEMIES LIST

IT HAS BEEN DOCUMENTED BY ME,	1AW	NDA WORTHEY NAME	
CLASSIFICATION SPECIALIST	STATON	CORRECTIONAL FACILI	<u>TY</u> ,
		NAME	
B/M , AIS # 152447 R/S	, <u>S</u> '	TATON CORRECTIONAL EINSTITUTION	PACILITY
CANNOT LIVE IN POPULATION WITH	THE FOLLOWI	NG NAMED INMATES WI	THOUT
FEAR OF BODILY HARM:			
NAME	R&S	AIS #	INSTITUTION
JOLLY, ANDRE	_B/M_	128255	KILBY

DISTRIBUTION WILL BE MADE TO THE GREEN FILE AND THE CENTRAL FILE ON ALL OF THE ABOVE NAMED INMATES. THE CENTRAL FILE COPY SHOULD BE SENT DIRECTLY TO THE SUPERVISOR OF THE RECORDS & ID SECTION OF THE CENTRAL RECORDS DIVISION FOR PERMANENT PLACEMENT IN THE FRONT OF THE CENTRAL FILE. THE GREEN FILE COPY WILL BE SENT TO THE SOCIAL SERVICES COORDINATOR, IF THE INMATE(S) IS LOCATED IN OTHER INSTITUTIONS, FOR PERMANENT PLACEMENT IN THE FRONT OF THE GREEN JACKET. DOCUMENTATION AND/OR REASONS WHY THE INMATE(S) SHOULD BE KEPT SEPARATE WILL BE RECORDED ON THE BACK OF THIS FORM. IT IS ESSENTIAL THAT REASONS FOR SEPARATION BE SPECIFIC, WELL DOCUMENTED, AND FACTUAL.

**BOC #252** 

# **ENEMY VALIDATION COMMITTEE**

FROM:	Wanda Worthey, Classification Spec. DATE: 01/19/2007
RE:	Grant, Michael BM#152447
	itutional Enemy Validation Committee aton Correctional Facility
	nate referenced above has claimed the following inmate(s) as being his enemy (ies):  Andre BM#128255
For rea	son(s) indicated below:
	eptember 4, 2006, while both subject's were assigned to Staton Correctional
	y, inmate Andre Jolly (BM#128255) did stab inmate Michael Grant
(BM#1	152447) in the neck and upper arm with a prison made knife.
Please	review and render a decision as to whether or not this is a valid enemy situation.
	notify time I France Validation Committee
FROM: I	nstitutional Enemy Validation Committee Staton Correctional Facility
• -	ssification Coordinator aton Correctional Facility
After a ju	idicious review of the above referenced matter, the following decision is rendered:
It is in the	e best interest of institutional security that the two aforementioned inmates not
be house	ed in the same population. This is determined to be a valid enemy situation.
کمک	Walkon Edwa (Robinson) Och Domini
VALIDAT	ION COMMITTEE VALIDATION COMMITTEE VALIDATION COMMITTEE

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### ENEMIES LIST

IT HAS BEEN DOCUMENTED BY ME,	WANDA WORTHEY	,
	NAME	
CLASSIFICATION SPECIALIST	, STATON CORRECTIONA INSTITUTI	L FACILITY ,
TITLE	103111011	, OIN
01-19-2007 , THA	T INMATE JAMES MONROE NAME	
		·
B/M , AIS # 167435 R/S	, STATON CORRE	FION
	U TUE FOLLOUTHO NAMED TA	WASTEC LITTUOUT
CANNOT LIVE IN POPULATION WIT	H JHE FOFFOMING NAMED IL	AMWIE2 MILLOOL
FEAR OF BODILY HARM:		
NAME	R&S AIS	# INSTITUTION
JOLLY, ANDRE	B/M 128255	KILBY
199		
		·

DISTRIBUTION WILL BE MADE TO THE GREEN FILE AND THE CENTRAL FILE ON ALL OF THE ABOVE NAMED INMATES. THE CENTRAL FILE COPY SHOULD BE SENT DIRECTLY TO THE SUPERVISOR OF THE RECORDS & ID SECTION OF THE CENTRAL RECORDS DIVISION FOR PERMANENT PLACEMENT IN THE FRONT OF THE CENTRAL FILE. THE GREEN FILE COPY WILL BE SENT TO THE SOCIAL SERVICES COORDINATOR, IF THE INMATE(S) IS LOCATED IN OTHER INSTITUTIONS, FOR PERMANENT PLACEMENT IN THE FRONT OF THE GREEN JACKET. DOCUMENTATION AND/OR REASONS WHY THE INMATE(S) SHOULD BE KEPT SEPARATE WILL BE RECORDED ON THE BACK OF THIS FORM. IT IS ESSENTIAL THAT REASONS FOR SEPARATION BE SPECIFIC, WELL DOCUMENTED, AND FACTUAL.

**BOC #252** 

## **ENEMY VALIDATION COMMITTEE**

FROM:	Wanda Worthey, Classification Spec.	DATE:	01/19/2007
RE:	Monroe, James BM#167435		
	itutional Enemy Validation Committee aton Correctional Facility		
	nate referenced above has claimed the fo Andre BM#128255	ollowing inn	nate(s) as being his enemy (ies):
For rea	son(s) indicated below:		
Facilit	eptember 4, 2006, while both subject's we y, inmate Andre Jolly (BM#128255) did st 167435) in the back and right elbow with	tab inmate	James Monroe
Please	review and render a decision as to wheth	ner or not ti	nis is a valid enemy situation.
FROM: I	nstitutional Enemy Validation Committee Staton Correctional Facility		
	ssification Coordinator aton Correctional Facility		
After a ju	udicious review of the above referenced n	natter, the f	ollowing decision is rendered:
It is in th	e best interest of institutional security that ed in the same population. This is determ	t the two af nined to be	orementioned inmates not a valid enemy situation.
<u>Jonda</u> VALIDAT	100 COMMITTEE VALIDATION COM	ofinson imittee	VALIDATION COMMITTEE